

### REMARKS

Editorial corrections have been made to the specification. Claims 1 - 2, 4, 6 - 9, and 11 have been amended. Claims 12 - 24 have been added. No new matter has been introduced with these corrections, amendments, or added claims, which are supported in the specification as originally filed. Claims 1 - 24 are now in the application.

#### I. Drawing Corrections

As discussed above in "Amendments to the Drawings", a proposed replacement drawing is submitted herewith for Fig. 3. This proposed replacement drawing corrects alignment of several brackets, such that they do not cross over into the text. No new matter is introduced.

#### II. Rejection under 35 U.S.C. §102(a)

Paragraph 3 of the Office Action dated April 19, 2004 (hereinafter, "the Office Action") states that Claims 1 - 11 are rejected under 35 U.S.C. §102(a) as being anticipated by "Towards Self-Validating Knowledge-Based Archives", IEEE, 4/2001 (hereinafter, "the IEEE paper"). This rejection is respectfully traversed.

Applicants have amended their independent Claims 1, 6, and 9 herein to more clearly specify that the validation criteria are encapsulated "within", rather the "with", the data model. Sec, for example, p. 4, lines 13 - 15 of Applicants' specification, where this is supported (explaining that the encapsulating of validation with the data values causes the validation to "become a part of" the data model — in other words, the validation criteria are "within" the data

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model). See also p. 7, lines 3 - 4.

The IEEE paper teaches that a number of items are packaged together in an "Information Package", or "IP". Among these items is the "actual *content information* CI" (emphasis original). See p. 11, left column, first paragraph, lines 12 - 13. See also the equation on line 25 of this column. As shown therein, "preservation description information", or "PDI", is packaged at the same level as the CI. However, there is no teaching that the "actual content information" has validation criteria encapsulated "within a data model to which they apply" (emphasis added), as in the second limitation of Applicants' independent Claims 1, 6, and 9.

In addition, lines 28 - 31 of the left column on p. 11 of the IEEE paper teach that the IP includes, at a "*data- or instance-level*, ... individual objects like tuples and records. Such object-level information is packaged into the CI." (emphasis original) There is no discussion of the CI also containing validation.

Furthermore, lines 40 - 45 of the left column on p. 11 of the IEEE paper teach that the "information at the *conceptual-level* [of the IP] captures *knowledge* about the archive and includes, e.g., ... derived knowledge (expressed via logic rules)". (emphasis original) Applicants' independent Claims 1, 6, and 9 specify defined validation criteria, not derived knowledge as taught by the IEEE paper.

This text in the left column on p. 11 of the IEEE paper continues by stating that "some of this knowledge fits into the CON [context] package" while it is suggested that a "distinct

*knowledge package KP*” (emphasis original) should also be added “as part of the PDI” (i.e., as part of the “preservation description information”). Notably, lines 16 - 17 of this column of the IEEE paper state that the “CON” information is for “relation to information external to the IP” (emphasis added), and line 25 shows that the PDI information is at the same level as, but separate from, the actual content information or “CI”. This is distinct from Applicants’ claimed encapsulation of the validation criteria within the data model.

The Office Action cites the last two lines of the right column of p. 11 of the IEEE paper as teaching Applicants’ “encapsulating ...” limitation. However, what is described in the cited text is the structure of an IP. See the beginning of the cited sentence, “In particular, the structure of an information package IP ...” (emphasis added). The cited text further refers to validating the structure “as indicated in (\*)” -- that is, the structure depicted on line 25 of the left column of p. 11. This type of validation would generally comprise ensuring that the IP contained a “DI” element, which contains a “PI” element, which in turns contains both a “CI” and a “PDI” element, and so forth. Validating the structure of an IP is not “validation criteria for a data value”, as in Applicants’ claim limitations.

As an example of validating a data value, Applicants’ specification describes examples of validating a social security number to ensure that it contains exactly 9 digits (and optional dashes). See p. 7, lines 5 - 9 and Fig. 3. By contrast, validating the structure of this value might comprise using a DTD or schema-like mechanism with a validating parser to determine whether the social security number element exists within an XML document to which the DTD/schema applies. See

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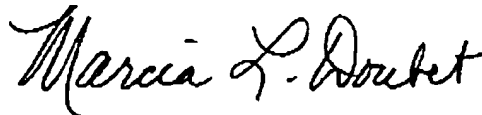
also p. 13 of the IEEE paper, left column, final paragraph of §3.1, "XML Extensions as Constraint Languages", which discusses using DTDs to validate "structural constraints" of XML documents.

Accordingly, Applicants respectfully submit that their independent Claims 1, 6, and 9 are patentable over the cited reference. The dependent claims are therefore deemed patentable over the reference as well, and the Examiner is respectfully requested to withdraw the §102 rejection.

III. Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all claims at an early date.

Respectfully submitted,



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Attachment: Replacement Sheet (1)

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